

## **MEMORANDUM**

**TO:** District of Columbia Zoning Commission

**FROM:** *JL for* Jennifer Steingasser, Deputy Director

**DATE:** October 7, 2016

**SUBJECT:** **Setdown Report** for ZC #16-17, St. Joseph's Seminary, 1200 Varnum Street, NE Consolidated Planned Unit Development and Related Map Amendment

### **I. SUMMARY RECOMMENDATION**

EYA Development has submitted an application for a consolidated PUD and related map amendment to construct an 82-unit rowhouse community in the Michigan Park neighborhood. The application also seeks flexibility to a number of provisions of the Zoning Regulations. The proposal is generally not inconsistent with the policies and land use maps of the Comprehensive Plan. The Office of Planning (OP) has identified some items for which more information or clarification is needed, but those matters could be addressed in future submissions from the applicant. OP, therefore, recommends that the application be set down for public hearing.

### **II. APPLICATION-IN-BRIEF**

<b>Location</b>	1200 Varnum Street, NE – property includes most of the square bounded by Varnum Street on the south, 13 <sup>th</sup> Street and Sargent Road on the east, Allison Street on the north, and 12 <sup>th</sup> Street on the west; Square 3917, Lot 800 Ward 5, ANC 5A (ANC 5B on the south side of Varnum Street)
<b>Property Size</b>	349,294 square feet (~8 acres)
<b>Applicant</b>	EYA Development
<b>Current Zoning</b>	R-2 (low density residential)
<b>Existing Use of Property</b>	St. Joseph's Seminary building, surrounded by lawns and open space
<b>Proposed Zoning</b>	RA-1 (moderate density apartment zone – rowhouses permitted as a matter-of-right)
<b>Comprehensive Plan Generalized Policy Map</b>	Institutional

<b>Comprehensive Plan Future Land Use</b>	Institutional
<b>Proposed Use of Property</b>	<ul style="list-style-type: none"> <li>- Preserve the existing seminary building</li> <li>- Preserve the southern half of the site through an easement as permanent open space</li> <li>- Preservation of 53-inch diameter oak tree</li> <li>- Construct 82 rowhouses and associated private streets, alleys and open spaces on the northern half of the site</li> <li>- 183,756 sf new construction + 103,750 sf existing = 0.96 FAR (not counting land area of private streets and alleys)</li> <li>- 40', 3 stories maximum height for new rowhouses</li> <li>- 19,967 sf open space in the "park", "green" and "west lawn park"</li> <li>- 93,686 sf other open space in the easement area</li> <li>- Parking – 155 total spaces – 109 spaces in garages, 25 reserved on-street spaces, 21 guest on-street spaces</li> </ul>
<b>Requested Flexibility</b>	<ol style="list-style-type: none"> <li>1. PUD-related map amendment from R-2 to RA-1;</li> <li>2. U § 421 – New residential developments in the RA-1 zone;</li> <li>3. U § 420.1(a) – Clerical and religious group residences;</li> <li>4. C § 1500.4 – Penthouse;</li> <li>5. F § 304 – Lot occupancy;</li> <li>6. F § 305 – Rear yard;</li> <li>7. F § 306 – Side yard;</li> </ol>

### III. SUMMARY OF OP COMMENTS

OP supports the proposed development and feels the project is generally not inconsistent with the Comprehensive Plan. The following summarizes OP comments from this report.

<b>OP Comment</b>	<b>Planning and / or Zoning Rationale</b>
Submit a tree study from a licensed arborist that states that the proposed limits of construction near the 53" oak tree are acceptable and demonstrates how the tree will be protected both during construction and after.	It is a goal of the District to preserve tree cover, especially healthy, large trees such as the example on the St. Joseph's site.
OP recommends that the affordable units be less concentrated and that they include rear decks, roof decks and front porches.	District policy supports an even distribution of IZ units throughout a project, and the Regulations require that the exteriors of IZ units be indistinguishable from market rate units.
The design should eliminate curb cuts on the private streets.	The pedestrian environment would be improved with the elimination of curb cuts, and the building façades would be upgraded.

OP Comment	Planning and / or Zoning Rationale
Relocate trash collection areas for Buildings 9 and 10.	Locating trash collection areas directly beneath the windows of the end units would result in negative impacts to the residents.
Provide a plan that shows the boundaries of the open space easement.	In order to evaluate the benefit to the public and the District, exhibits sufficient to fully review the easement are required.
Prepare additional renderings looking down the public and showing the relationship of the existing buildings to the proposed development. Alley-scape rendering should also be provided.	Renderings are valuable in evaluating the project, and its' compatibility with the existing neighborhood.
Examine the architecture of the end façades of Buildings 9 and 10, which frame the view from the north toward the seminary.	Because of their important position in the urban design framing the seminary and the central gardens, those façades should be more symmetric and fully detailed.

OP will continue to work with the applicant to adequately address these issues, and other issues raised by the Commission at setdown, prior to a public hearing.

#### IV. SITE AND AREA DESCRIPTION



The subject site occupies most of the square bounded by Varnum Street on the south, 13th Street and Sargent Road on the east, Allison Street on the north, and 12th Street on the west. Webster Street terminates on the eastern side of the property. The surrounding neighborhood is a mix of detached homes, semi-detached homes, and triplexes (three attached units). Two triplexes, for a total of six units, occupy the northeast corner of the subject square. Providence hospital is directly across 12<sup>th</sup> Street to the west of the site. To the north, east and south, the entire neighborhood is zoned R-2. Providence Hospital and areas to the west are zoned RA-1

The subject site is dominated by the existing seminary building, which dates to 1930. The topography slopes up from Varnum Street toward the south side of the building, where the main entrance is located, and on the north side of the structure the lot is generally flat. The driveway and parking area for the seminary are accessed from 12<sup>th</sup> and 13<sup>th</sup> Streets, and a service drive is also accessed from 13<sup>th</sup> Street. The property is mostly open lawn along with many mature trees. The largest of these is a 53-inch diameter red oak, located west of the seminary.

## V. PROJECT DESCRIPTION

### Site Plan

The applicant proposes to construct 82 rowhouses on the northern side of the lot. The applicant worked with both the Development Review and the Historic Preservation divisions of the Office of Planning to refine the site plan, which OP now generally supports. The site plan would extend Webster Street through the site as a private street, and would also create a new north-south private street. Private alleys would provide vehicular access to the rear of the most of the dwellings, and would connect to an existing public alley at the northeast corner of the property. Homes without alley access would have reserved on-street spaces. Trash pick-up would generally be from alleys, but for homes without an alley the trash would be wheeled out from the back of the homes by the contractor.



For buildings 9 and 10, the design shows a trash collection area at the south end of those buildings, directly under a second story window for the end unit. Please refer to Sheet 7A of Exhibit 2H. The trash area directly below a window would result in negative impacts to residents of those units, and the applicant should find another location for collection of trash from buildings 9 and 10. OP's remaining concerns with the site plan include the proximity of the homes on Webster Street to the very large oak tree (discussed in more detail below), and the five proposed curb cuts – four along the north-south private street and one on Webster.

The southern part of the property will remain largely as-is. The seminary building will be preserved, and the applicant will submit a landmark nomination for the structure, which the St. Joseph's Society will continue to use. The seminary's driveway, parking and service drive will not be changed, and the service functions of the seminary will remain at the northeast corner of the building. The lawns on the southern side of the site would be retained, and much of the area would be preserved through a permanent open space easement. OP has asked the applicant to provide a plan that shows the boundaries of the easement.

The applicant would construct a play and seating area on the western side of the seminary building which would be open to the public. The two larger open spaces within the new development would also be open to the public – a more active park on the north side of Webster Street, and a more passive park on the south side, reflecting the gardens within the court of the Seminary.

### **Inclusionary Zoning**

In order to meet the IZ requirements of the RA-1 zone, the applicant proposes 10 inclusionary units, which would equal 10.2% of the floor area of the project. While the RA-1 zone would require that half of the units be priced for low-income households and half for moderate-income households, the applicant proposes six units at 50% AMI and four units at 80% AMI.

<b>Residential Unit Type</b>	<b>GFA (sf)</b>	<b>Percentage of Total</b>	<b>Units</b>	<b>Affordable Control Period</b>	<b>Affordable Unit Type</b>
Total	183,756	100%	82		
Market Rate	165,013*	89.8%	72		
IZ – 80% AMI	7,534*	4.1%*	4	Perpetuity	For Sale
IZ – 50% AMI	11,209*	6.1%*	6	Perpetuity	For Sale
Affordable / Non IZ	n/a	-	-	-	-

\* Estimated by OP

The physical distribution of the affordable units is shown on Sheet 16B of Exhibit 2H11. OP recommends that the units labeled as 33, 34, 45 and 46 on the site plan not all be reserved as IZ



units. Those units, together with the affordable unit number 23, are the only ones in that portion of the project that would not have garages, and the only units in the entire development that would not have front porches. In addition to not having front porches, those units are also abutted by the proposed driveways on the adjacent units. Finally, it appears that most IZ units would not have an option for a rear deck. Subtitle C § 1005.2 states that “All inclusionary units shall be comparable in exterior design, materials and finishes to the market-rate units.” Please refer to Sheet 10F of the plans for an elevation drawing of the front façade in question, showing the units without front porches immediately adjacent to the garage doors of adjacent units.

## Architecture

The designs of the new rowhouses are intended to echo the architecture of the surrounding neighborhood. They would be visually grouped into pairs or triplexes, as are nearby homes, and would primarily use red brick, the predominant building material in the area. The peaked roofs and front gables are examples of other design features meant to help the new development blend in with the neighborhood. Please refer to Sheets 5A – 5C of Exhibit 2H for precedent photos and detail drawings. OP has asked the applicant to prepare additional renderings looking down the public streets and showing the relationship of the existing buildings to the proposed development. The one rendering that shows some context can be seen on Sheet 9A. The applicant should also consider providing renderings of alleys within the project. Prior to the public hearing the Historic Preservation staff will continue to work with the applicant to refine the building details. In particular, OP has asked the applicant to examine the end façades of Buildings 9 and 10, which frame the view from the north toward the seminary. The sides of the end units on those buildings should be made to look less like a side and more like a fully realized façade, potentially including centering the gable on that end.

## Tree Preservation

The applicant proposes to preserve a 53-inch oak tree near the northwest corner of the seminary. A rule of thumb is that a critical root zone is the same as the breadth of the tree's limbs. In this case, the applicant is showing the limits of disturbance as being well within that boundary. OP has asked the applicant to submit a tree study from a licensed arborist that states that the proposed limits of construction are acceptable and demonstrates how the tree will be protected both during construction and after.



## **VI. COMPREHENSIVE PLAN POLICIES**

The proposal would further the following Guiding Principles of the Comprehensive Plan, as outlined and detailed in Chapter 2, the Framework Element:

- (1) Change in the District of Columbia is both inevitable and desirable. The key is to manage change in ways that protect the positive aspects of life in the city and reduce negatives such as poverty, crime, and homelessness. (§ 217.1)
- (2) A city must be diverse to thrive, and the District cannot sustain itself by only attracting small, affluent households. To retain residents and attract a diverse population, the city should provide services that support families. A priority must be placed on sustaining and promoting safe neighborhoods offering [...] housing for families. (§ 217.2)
- (3) Diversity also means maintaining and enhancing the District's mix of housing types. Housing should be developed for households of different sizes, including growing families as well as singles and couples. (§ 217.3)
- (9) Many neighborhoods include commercial and institutional uses that contribute to their character. Neighborhood businesses, retail districts, schools, park and recreational facilities, houses of worship and other public facilities all make our communities more livable. These uses provide strong centers that reinforce neighborhood identity and provide destinations and services for residents. They too must be protected and stabilized. (§ 218.2)
- (10) The recent housing boom has triggered a crisis of affordability in the city, creating a hardship for many District residents and changing the character of neighborhoods. The preservation of existing affordable housing and the production of new affordable housing both are essential to avoid a deepening of racial and economic divides in the city. Affordable renter- and owner-occupied housing production and preservation is central to the idea of growing more inclusively. (§ 218.3)
- (11) The District of Columbia contains many buildings and sites that contribute to its identity. Protecting historic resources through preservation laws and other programs is essential to retain the heritage that defines and distinguishes the city. [...] (§ 218.4)

The application is also consistent with major policies from the Land Use, Transportation, Environmental Protection, Parks Recreation and Open Space, Urban Design, Historic Preservation and Upper Northeast elements of the Comprehensive Plan. The project would be largely consistent with policies from the Housing element, but could be refined to more completely achieve policy goals for inclusionary housing units that are indistinguishable from the market rate units. Please refer to Attachment 1 for a complete analysis of those elements of the Plan.

## VII. COMPREHENSIVE PLAN LAND USE MAPS

The Comprehensive Plan's Generalized Policy Map describes the subject site as appropriate for Institutional land uses, which includes religious organizations. The Comprehensive Plan (§ 223.22) states that "The fact that these areas are not designated as Conservation, Enhancement, or Change does not mean they are exempt from the policies of the Comprehensive Plan or will remain static... Much of the institutional land on the map represents colleges and universities; change and infill can be expected on each campus consistent with campus plans. Other institutional sites likewise may see new buildings or facilities added..." The residential neighborhood around the subject site is shown as a Neighborhood Conservation Area on the Generalized Policy Map.



The Future Land Use Map (FLUM) indicates that the site is appropriate for Institutional uses. The Comprehensive Plan defines Institutional uses on the FLUM as follows:

This designation includes land and facilities occupied and used by colleges and universities, large private schools, hospitals, religious organizations, and similar institutions. Smaller institutional uses such as churches are generally not mapped, unless they are located on sites that are several acres in size. Zoning designations vary depending on surrounding uses. (§ 225.16).



The Plan goes on to say that:

The zoning of any given area should be guided by the Future Land Use Map, interpreted in conjunction with the text of the Comprehensive Plan, including the



citywide elements and the area elements, as well as approved Small Area Plans. (§ 226.d)

The Map does not show density or intensity on institutional and local public sites. If a change in use occurs on these sites in the future (for example, a school becomes surplus or is redeveloped), the new designations should be comparable in density or intensity to those in the vicinity... (§ 226.h)

OP had previously asked the applicant to provide a comparison of the density of the proposed development against the density of the surrounding neighborhood, which is shown as Low Density Residential on the FLUM. That study, shown on Sheet 29 of Exhibit 2H, shows that the proposed density on the PUD site, 10.5 units per acre, would be comparable to the density in surrounding squares. Because of the overall density of the proposal, the preservation of significant open space on the site, and protection of the open space through an easement, OP finds that the project would not be inconsistent with the Comprehensive Plan land use maps.

## **VIII. ZONING RELIEF**

To construct as proposed, the applicant requests the following flexibility. A summary of each area of relief is given and OP will provide a complete analysis of the requested relief at the time of the public hearing.

### **1. PUD-related map amendment from R-2 to RA-1**

The proposed zone would be not inconsistent with the Comprehensive Plan.

### **2. U § 421 – New residential developments in the RA-1 zone;**

In the RA-1 zone new rowhouse developments require special exception review. As part of its review of the PUD, the Commission can review the special exception criteria of § 421.

### **3. U § 420.1(a) – Clerical and religious group residences;**

Although the religious use has existed on this property for 86 years, the applicant states that they are seeking approval under this section “out of an abundance of caution to confirm that its continued use of the Seminary building in the RA-1 zone following completion of the Project is lawfully conforming” (Exhibit 2, p. 60, footnote).

### **4. C § 1500.4 – Penthouse;**

The design of the proposed rowhouses would allow for optional rooftop decks, which would include an enclosed stairwell to the roof level.

## **5. F § 304 – Lot occupancy;**

The proposed site design would cluster open space rather than allocate open space to individual lots, and the rowhouse lot boundaries would be drawn relatively close to the perimeter of the dwellings. The lots, therefore, would have lot occupancies above the 40% permitted in the RA-1 zone. Please refer to Sheets 18A and 18B for the zoning parameters of each lot. Overall, the entire development would be under the permitted lot occupancy.

## **6. F § 305 – Rear yard;**

The proposed site design would cluster open space rather than allocate open space to individual lots, and the rowhouse lot boundaries would be drawn relatively close to the perimeter of the dwellings. The lots, therefore, would have rear yards less than the 20 feet required.

## **7. F § 306 – Side yard;**

As designed, most of the end rowhouse units would have small side yards, and the applicant has therefore requested relief. Most end-unit rowhouses in the District have the property line along their side building wall, and it is unclear why in this layout the lot boundaries are not similarly located. The applicant should also explain why lots 28 through 32 include the building restriction line area along Allison Street, but lots 1 and 17 do not. Sheet 17 of the plan set (Exhibit 2H) shows the lot boundaries.

# **IX. PURPOSE AND EVALUATION STANDARDS OF A PUD**

The purpose and standards for Planned Unit Developments are outlined in 11 DCMR, Subtitle X, Chapter 3. The PUD process is intended to:

- “provide for higher quality development through flexibility in building controls, including building height and density, provided that a PUD:
- (a) Results in a project superior to what would result from the matter-of-right standards;
  - (b) Offers a commendable number or quality of meaningful public benefits; and
  - (c) Protects and advances the public health, safety, welfare, and convenience, and is not inconsistent with the Comprehensive Plan” (§ 300.1).

The application exceeds the minimum site area requirements of § 301 to request a PUD. The applicant is requesting a consolidated PUD and related map amendment. In order to approve the project, the Commission must find that it would not be inconsistent with the Comprehensive Plan, would not result in unacceptable impacts on the area or on city services, and includes public benefits and project amenities that balance the flexibility requested and any potential adverse effects of the development (§§ 304.3 and 304.4). OP will provide at the time of the public hearing an analysis of the project's conformance with these standards, including its impact on city services, as informed by comments from referral agencies.

## **X. PUBLIC BENEFITS AND AMENITIES**

Subtitle X Section 305 of the Zoning Regulations discuss the definition and evaluation of public benefits and amenities. “Public benefits are superior features of a proposed PUD that benefit the surrounding neighborhood or the public in general to a significantly greater extent than would likely result from development of the site under the matter-of-right provisions of this title” (§ 305.2). “A project amenity is one (1) type of public benefit, specifically a functional or aesthetic feature of the proposed development that adds to the attractiveness, convenience, or comfort of the project for occupants and immediate neighbors” (§ 305.10). Section 305.5 lists several potential categories of benefit proffers, and “A project may qualify for approval by being particularly strong in only one (1) or a few of the categories in [that] section, but must be acceptable in all proffered categories and superior in many” (§ 305.12). The Commission “shall deny a PUD application if the proffered benefits do not justify the degree of development incentives requested (including any requested map amendment)” (§ 305.11).

Amenity package evaluation, therefore, is partially based on an assessment of the additional development gained through the application process. In this case, the application proposes a PUD-related map amendment from R-2 to RA-1, which would allow rowhouses as a building type.

	Existing Zoning (R-2)	Proposed Zoning (RA-1 PUD)	Proposed Development
Height	40', 3 stories	60'	40', 3 stories
FAR	n/a	0.9 – Matter-of-right 1.08 – IZ 1.296 – PUD	0.96

The application lists several potential benefits, some of which can be considered amenity items. Although it is typical for the details of the benefits and amenities package to be resolved closer to the public hearing date, the following is OP's preliminary summary of some of the benefits listed in the application. The proffered list is sufficient for setdown, and OP will continue to work with the applicant to refine the package of benefits.

Applicant's Amenities / Benefits	OP Comments
1. Urban design and architecture	<p>While a benefit of the project, OP does not find that the urban design and architecture rise to the level of an amenity, but rather that the site plan is a necessary reaction to fully meet the guidance of the Comprehensive Plan – to create a development compatible with the existing neighborhood while preserving the feeling of open space around the seminary.</p> <p>The other items cited by the applicant (Exhibit 2, p. 37) – “streets that are defined by elements such as buildings close to the street, front porches, street trees, on-street parking, residential garages accessed from rear alleys,” etc. – are simply the normal expectations of new development in the District.</p>
2. Open spaces and children's play area	<p>The proposed parks and the play area west of the seminary constitute valuable amenities for the residents of the project as well as the surrounding community.</p>
3. Site planning	<p>OP supports the site plan for the project, but as noted above, the site plan would not qualify as an amenity.</p>
4. Public art	<p>The applicant has indicated that they may locate public art within the project. If the art becomes a firm and detailed commitment it could be considered an amenity.</p>
5. Historic preservation	<p>Preservation of the seminary and much of its surrounding landscape, including designating them as an historic landmark, is a valuable amenity.</p>
6. Housing and affordable housing	<p>Housing can be considered a benefit, particularly when it includes units of three or more bedrooms, as the proposed development would. The applicant is also providing six IZ units at 50% AMI, where only five would be required. For a more impactful amenity, the applicant could examine ways to provide more IZ units.</p> <p>In order to fully count the housing of the project as a benefit, the applicant should ensure that the IZ units are adequately distributed throughout the development, and indistinguishable from the market rate units on the exterior.</p>
7. Social services	<p>The applicant cites the preservation of the seminary, and the continuing function of the St. Joseph's Society, as a benefit to the neighborhood and the city. The income generated from the development would help to sustain the operation of the order and their facility.</p>



Applicant's Amenities / Benefits	OP Comments
8. Environmental benefits	OP views the preservation of the 53-inch oak, if the boundaries of construction are found to be appropriate and conservation techniques adequate, a valuable amenity item. If the applicant wishes to claim the other listed items, such as stormwater management, as benefits, they should clarify how those features rise above simple mitigation or a requirement.
9. Transportation improvements	The creation of an internal alley network, the provision of public parking spaces on 12 <sup>th</sup> Street, and the provision of traffic calming measures on 13 <sup>th</sup> Street and Sargent Road could be benefits of the project. The applicant should provide more detail on the traffic calming measures. The applicant also proposes to pay for the installation of bike share station; As part of their commitment they should specify the cost of the proposed station.
10. First Source and LSDBE	No commitment at this time – the applicant should address their commitments to this important item prior to the public hearing.

## **XI. AGENCY REFERRALS**

If this application is set down for a public hearing, the Office of Planning will refer it to the following government agencies for review and comment:

- Department of Energy and the Environment (DOEE);
- Department of Transportation (DDOT);
- Department of Housing and Community Development (DHCD);
- Department of Parks and Recreation (DPR);
- Department of Public Works (DPW);
- DC Public Schools (DCPS);
- Fire and Emergency Medical Services Department (FEMS);
- Metropolitan Police Department (MPD);
- DC Water.

## **XII. ATTACHMENT**

1. Comprehensive Plan Policies

JS/mrj

## **Attachment 1**

### **Comprehensive Plan Policies**

The proposal would further the following policies of the Comprehensive Plan.

#### ***Land Use Element***

§ 307.2        Infill development on vacant lots is strongly supported in the District of Columbia, provided that such development is compatible in scale with its surroundings and consistent with environmental protection and public safety objectives. In residential areas, infill sites present some of the best opportunities in the city for "family" housing and low-to-moderate-density development...

§ 307.3        In both residential and commercial settings, infill development must be sensitive to neighborhood context. High quality design standards should be required, the privacy of neighboring structures should be respected, and density and scale should reflect the desired character of the surrounding area.

#### **Policy LU-2.1.3: Conserving, Enhancing, and Revitalizing Neighborhoods**

Recognize the importance of balancing goals to increase the housing supply and expand neighborhood commerce with parallel goals to protect neighborhood character, preserve historic resources, and restore the environment. The overarching goal to "create successful neighborhoods" in all parts of the city requires an emphasis on conservation in some neighborhoods and revitalization in others.

#### ***Transportation Element***

#### **Policy T-1.1.3: Context-Sensitive Transportation**

Design transportation infrastructure to support current land uses as well as land use goals for compact, accessible neighborhoods. Make the design and scale of transportation facilities compatible with planned land uses.

#### **Policy T-2.3.2: Bicycle Network**

Provide and maintain a safe, direct, and comprehensive bicycle network connecting neighborhoods, employment locations, public facilities, transit stations, parks and other key destinations. Eliminate system gaps to provide continuous bicycle facilities. Increase dedicated bike-use infrastructure, such as bike-sharing programs like Capital Bikeshare, and identify bike boulevards or bike-only rights of way.

**Action T-2.3.A: Bicycle Facilities**

Wherever feasible, require large new commercial and residential buildings to be designed with features such as secure bicycle parking and lockers, bike racks, shower facilities, and other amenities that accommodate bicycle users.

***Housing Element***

**Policy H-1.1.3: Balanced Growth**

Strongly encourage the development of new housing on surplus, vacant and underutilized land in all parts of the city. Ensure that a sufficient supply of land is planned and zoned to enable the city to meet its long-term housing needs, including the need for low- and moderate-density single family homes as well as the need for higher-density housing.

**Policy H-1.2.1: Affordable Housing Production as a Civic Priority**

Establish the production of housing for low and moderate income households as a major civic priority, to be supported through public programs that stimulate affordable housing production and rehabilitation throughout the city.

**Policy H-1.3.1: Housing for Families**

Provide a larger number of housing units for families with children by encouraging new and retaining existing single family homes, duplexes, row houses, and three- and four-bedroom apartments.

***Environmental Protection Element***

**Policy E-1.1.1: Street Tree Planting and Maintenance**

Plant and maintain street trees in all parts of the city, particularly in areas where existing tree cover has been reduced over the last 30 years. Recognize the importance of trees in providing shade, reducing energy costs, improving air and water quality, providing urban habitat, absorbing noise, and creating economic and aesthetic value in the District's neighborhoods.

**Policy E-1.1.2: Tree Requirements in New Development**

Use planning, zoning, and building regulations to ensure that trees are retained and planted when new development occurs, and that dying trees are removed and replaced. If tree planting and landscaping are required as a condition of permit approval, also require provisions for ongoing maintenance.

***Parks, Recreation and Open Space Element***

§807.1      The addition of thousands of new jobs and households over the next 20 years will increase demand for programmed parks, open space, and recreational activities. Existing parks will accommodate more users, particularly in neighborhoods where

high-density infill development is planned. New parks will be needed to serve new and growing communities. Given the built out character of the city, finding land for such parks will be difficult and expensive. The District must seize opportunities for parkland dedication on its largest redevelopment sites and take steps now to ensure that parks are provided elsewhere as the city grows.

**Policy PROS-1.4.3: Parks on Large Sites**

Include new neighborhood and/or community parks on large sites that are redeveloped for housing and other uses that generate a demand for recreational services. The potential for such parks to enhance the connectivity of parks and open spaces throughout the city should be an important planning and design consideration, particularly where multiple large adjacent sites are being redeveloped.

***Urban Design Element***

**Policy UD-2.2.1: Neighborhood Character and Identity**

Strengthen the defining visual qualities of Washington's neighborhoods. This should be achieved in part by relating the scale of infill development, alterations, renovations, and additions to existing neighborhood context.

**Policy UD-2.2.8: Large Site Development**

Ensure that new developments on parcels that are larger than the prevailing neighborhood lot size are carefully integrated with adjacent sites. Structures on such parcels should be broken into smaller, more varied forms, particularly where the prevailing street frontage is characterized by small, older buildings with varying facades.

**Policy UD-2.3.2: Large Site Scale and Block Patterns**

Establish a development scale on large sites that is in keeping with surrounding areas. "Superblocks" (e.g., oversized tracts of land with no through-streets) should generally be avoided in favor of a finer-grained street grid that is more compatible with the texture of Washington's neighborhoods. This also allows for more appropriately scaled development and avoids large internalized complexes or oversized structures.

***Historic Preservation Element***

**Policy HP-1.3.1: Designation of Historic Properties**

Recognize and protect significant historic properties through official designation as historic landmarks...

§ 1012.1 Tree-lined streets and landscaped front yards unite many historic neighborhoods, and there are small green oases scattered throughout the city. Some are publicly



owned, and others are private. Many provide the setting for historic buildings, creating a balance between the natural and built environment that is a unifying feature of the city. Such settings should be protected and maintained as significant landscapes in their own right or as contributing features of historic landmarks and districts.

**Policy HP-2.5.2: Historic Landscapes**

Preserve the distinguishing qualities of the District's historic landscapes, both natural and designed. Protect public building and monument grounds, parks and parkway systems, government and institutional campuses, gardens, cemeteries, and other historic landscapes from deterioration and incompatible development.

**Policy HP-2.5.6: Historic Open Space**

Retain landscaped yards, gardens, estate grounds, and other significant areas of green space associated with historic landmarks whenever possible. If development is permitted, retain sufficient open space to protect the setting of the historic landmark and the integrity of the historic property. In historic districts, strive to maintain shared open space in the interior of blocks while balancing the need to accommodate reasonable expansion of residential buildings.

***Upper Northeast Area Element***

§ 2407.2(f) Although seminaries, cemeteries, and institutions provide much greenery, and the community is ringed by the National Arboretum, the Anacostia River, and the Fort Circle Parks, much of Upper Northeast is starved for public parkland. More active recreational areas, playgrounds, athletic fields, and traditional neighborhood parks are needed. ...There are also concerns that the large institutional open spaces—particularly the great lawns and wooded glades of the area's religious orders—may someday be lost to development. These properties are important to the health of the community and should be considered as opportunities for new neighborhood and community parks (as well as housing) if they become available. They are the “lungs” of the neighborhood.

**Policy UNE-1.2.7: Institutional Open Space**

Recognize the particular importance of institutional open space to the character of Upper Northeast, particularly in and around Brookland and Woodridge. In the event that large institutional uses are redeveloped in the future, pursue opportunities to dedicate substantial areas as new neighborhood parks and open spaces. Connections between Upper Northeast open spaces and the network of open space between McMillan Reservoir and Fort Totten also should be pursued.

The proposal could more fully meet the following policy of the Comprehensive Plan.

***Housing Element***

**Policy H-1.1.5: Housing Quality**

Require the design of affordable housing to meet the same high-quality architectural standards required of market-rate housing. Regardless of its affordability level, new or renovated housing should be indistinguishable from market rate housing in its exterior appearance and should address the need for open space and recreational amenities, and respect the design integrity of adjacent properties and the surrounding neighborhood.